

Exhibit 7

1 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF HUMBOLDT

2 - - - - -x
CARLA ALLEN,

3
Plaintiff,

4
-against-

NO. DR180132

5
BRENNTAG NORTH AMERICA, INC.,
6 (sued individually and as
successor-in-interest to MINERAL
7 PIGMENT SOLUTIONS, INC., and as
successor-in-interest to WHITTAKER
8 CLARK & DANIELS, INC.), et al.,
9 Defendants.

- - - - -x

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11
12 DEPOSITION OF JACQUELINE MOLINE

13
14 Great Neck, New York
15 Friday, September 14, 2018
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21
22

23 Reported by:
24 JEFFREY BENZ, CRR, RMR
25 JOB NO. 146576

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September 14, 2018
10:11 a.m.

Deposition of JACQUELINE MOLINE, held at 175
Community Drive, Great Neck, New York, before
Jeffrey Benz, a Certified Realtime Reporter,
Registered Merit Reporter and Notary Public of the
State of New York.

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1 of that apart from timeframes, when she used it,
2 and other testing that's also been done with a
3 similar timeframe.

4 And if we can just -- give me five
5 seconds here.

6 Q. Sure.

7 (Recess from 3:36 p.m. to 3:42 p.m.)

8 Q. Dr. Moline, not much left.

9 The Gordon 2014 article you'll be
10 relying on in this case, as well, right?

11 A. It's an article that talks about
12 exposure and -- and Cashmere Bouquet, so yes, I
13 will be relying.

14 Q. And in that article, the -- the author
15 has conducted not only product testing but also
16 releasability testing, right?

17 A. Correct.

18 Q. Okay. Based on your review of
19 Dr. Longo's report, he only conducted product
20 testing, correct?

21 MS. KAGAN: With respect to Cashmere
22 Bouquet?

23 Q. Correct.

24 A. In -- correct. That was -- right.
25 That was what his report contained.

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1 Q. Only because I don't think this was
2 asked of you previously, but how much did you
3 earn testifying for plaintiffs in asbestos
4 litigation last year?

5 MS. KAGAN: You mean '18 or '17? 2017
6 or this calendar year?

7 MR. MULARCZYK: 2017.

8 A. I don't know the exact number.
9 It's -- it's a percentage of my salary.

10 It's about 40 percent of my total
11 income.

12 Q. And what was your total income last
13 year?

14 A. I -- really -- I don't think it's an
15 appropriate question for you to ask what my
16 salary is and my total income is. I'm going to
17 decline to answer that question. I've given you
18 a percentage of how much income I make.

19 Q. You can't estimate at all for me the
20 percentage of income you made with respect to
21 asbestos litigation?

22 A. I just told you it was about
23 40 percent.

24 Q. Right, but I don't know what
25 40 percent means.

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1 MS. KAGAN: She just told you she's
2 not going to tell you that number, so next
3 question.

4 MR. MULARCZYK: I thought she was just
5 uncomfortable with her total income, not
6 the one related to asbestos litigation.

7 Q. Are you -- I was just -- I thought you
8 were uncomfortable with respect to your total
9 income, not the one limited to your asbestos
10 litigation. But if you --

11 A. I'm not uncomfortable telling you
12 about the asbestos litigation. I don't have the
13 exact number. I actually have an extension on
14 my taxes, and I have not filed in my taxes. I
15 don't have the exact number.

16 Q. What was it in 2016? Do you know?

17 A. I haven't memorized the exact numbers
18 of how much it is. Again, the percentages have
19 been about 40 percent of my total income.

20 Q. Okay. All right.

21 MR. MULARCZYK: That's all I have.
22 Thanks.

23 MS. KAGAN: Ed, ready to go?

24 MR. ULLOA: Yeah, I am.

25 MS. KAGAN: Okay. Cool, go.

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1 EXAMINATION BY MR. ULLOA:

2 Q. Dr. Moline, I got a couple documents
3 I'm going to ask you to get out so we can refer
4 to them so I can move pretty quickly here. The
5 first one is your declaration, which I
6 understand has been marked as Exhibit 1.

7 And I have three other documents that
8 Ms. Kagan was very kind enough to make copies
9 for me and have in front of you.

10 I -- we're at Number 6 now; is that
11 correct? Exhibit 6?

12 THE COURT REPORTER: 6 is the next one
13 to be marked, yes.

14 MS. KAGAN: Ed, you mentioned the
15 declaration. Are you talking about the
16 August 31st declaration, which is
17 Exhibit 1, or --

18 MR. ULLOA: Exactly.

19 MS. KAGAN: Okay.

20 MR. ULLOA: Exactly. August 31st, I'm
21 sorry. So I'm just going to use that one.

22 And then let's do the Compton reliance
23 list as Exhibit 6.

24 MS. KAGAN: Okay.

25 MR. ULLOA: Compton dec -- go ahead,

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possession of the original transcript. We will make it available for anybody to see upon reasonable request. We also can stipulate to using certified copies for motion practice and in court. Yes? Yes?

MR. MULARCZYK: So stipulated. Is she going to review or waive?

THE WITNESS: Waive.

MS. KAGAN: There you go. Okay. Great. Thanks so much, everyone. Adios.
(Time noted: 5:50 p.m.)

JACQUELINE MOLINE

Subscribed and sworn to before me
this day of 2018.

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C E R T I F I C A T E

STATE OF NEW YORK)

) Ss.:

COUNTY OF NEW YORK)

I JEFFREY BENZ, a Certified Realtime Reporter, Registered Merit Reporter and Notary Public within and for the State of New York, do hereby certify:

That JACQUELINE MOLINE, the witness whose examination is hereinbefore set forth, was duly sworn by me and that this transcript of such examination is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 17th of September, 2018.

JEFFREY BENZ, CRR, RMR

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-----EXHIBITS-----			
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Exhibit 1	Declaration of Dr. Moline executed August 31, 2018	10	5
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WITNESS DIRECTED NOT TO ANSWER:
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